

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

L.W., a minor, by and through their parent,  
C.W.; K.S., a minor, by and through their  
parent, M.S.; A.K. a minor, by and through  
their parent, J.K.; W.M., a minor, by and  
through their parent, S.M.; L.B., a minor, by  
and through their parent, B.B.; T.J., a minor,  
by and through their parent, M.L.; A.M., a  
minor, by and through their parent, M.M.,

Case No. 21-cv-1136-MJH

Plaintiffs,

v.

CANON-MCMILLAN SCHOOL DISTRICT,  
a Pennsylvania governmental entity,  
MANUEL PIHAKIS, PETE MONIODES,  
DARLA BOWMAN-MONACO, MICHAEL  
CAPORIZZO, ZEFFIE CARROLL, MARK  
DOPUDJA, JOSEPH ZUPANCIC, MARY  
BETH KLINE, and BERNARD PRICE all  
individual elected officials sued in their  
individual capacity and in their capacity as  
members of the CANON-MCMILLAN  
SCHOOL DISTRICT BOARD OF SCHOOL  
DIRECTORS, a Pennsylvania elected  
legislative body, MR. MICHAEL DANIELS,  
Superintendent of the CANON-MCMILLAN  
SCHOOL DISTRICT,

Defendants.

**MOTION FOR TEMPORARY RESTRAINING ORDER**

AND NOW come above-named Plaintiffs, by and through their counsel Alexander W. Saksen and the law firm of Goldberg Kamin & Garvin, LLP and move this Court for an Order granting their *Ex Parte* Application for: 1) a temporary restraining order; 2) an order restraining the School Board of the Canon McMillan School District; 3) an order to show cause why a preliminary injunction should not issue; and 4) an order authorizing expedited discovery against the Defendants to the Complaint and attached hereto. The legal and factual support for this motion

is contained in Memorandum of Law filed of even date herewith. A proposed order is filed herewith.

Respectfully submitted,

GOLDBERG, KAMIN, AND GARVIN

/s/Alexander W. Saksen

Alexander W. Saksen

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Attorney for Plaintiffs

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Complaint was served by e-mail on this 27th day of August 2021, addressed to the below parties and counsel:

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/s/ Alexander Saksen

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